

EXHIBIT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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CRUMP INSURANCE SERVICES,
INC.,

Plaintiff,

vs.

MICHAEL P. McGRATH, an
individual, ALL RISKS, LTD.,
a corporation, and Does 1
through 50, inclusive,

Defendants.

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JG Jane GROSSMAN
RS REPORTING Services

No. C-07-4636 MMC

DEPOSITION OF MICHAEL P. McGRATH

Volume II

(Pages 200 through 274)

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Taken before JANE GROSSMAN

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DEPOSITION OF MICHAEL P. McGRATH - VOLUME II

1 conversation with him -- with Matt Nichols, were you
2 still employed at Crump?

3 A. Yes.

4 Q. When you made that statement to Matt Nichols,
5 did you think that Cynthia Marty was a valuable employee
6 to Crump?

7 MS. RUTTER: Objection. Vague as to "that
8 statement."

9 THE WITNESS: Sure.

10 MR. ASKANAS: Q. When you made that statement
11 to Matt Nichols, did you think that you were acting in
12 Crump's best interests?

13 MS. RUTTER: Objection. Vague, ambiguous, and
14 to the extent it calls for a legal conclusion.

15 MR. ASKANAS: Q. You can answer.

16 A. Acting in Crump's best interests?

17 Q. Yes.

18 A. In making sure that Cyndi had the same term as
19 me in moving to All Risks?

20 Q. Yes.

21 A. That's not in Crump's best interests.

22 Did I understand that question correctly?

23 Q. I think you did.

24 A. Okay.

25 Q. What information did you provide to All Risks